

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JUDY HARPER,)	
)	
Plaintiff,)	
)	
Vs.)	CIVIL ACTION
)	FILE NO. 1:08-CV-3905-JEC-ECS
EQUIFIRST CORPORATION, EFC)	
HOLDINGS, RTL FINANCIAL,)	
HOMEQ SERVICING, and SELENE)	
FINANCE LP,)	
)	
Defendants.)	

**CONSENT MOTION BETWEEN PLAINTIFF AND DEFENDANT SELENE FINANCE LP
REGARDING DISCOVERY PROCEDURES AND CONDUCT**

COME NOW Plaintiff and Defendant Selene Finance, LP, a Defendant in the above-styled civil action ("Selene"), and jointly move the Court to approve their agreement regarding certain discovery procedures and conduct as between them. The substance of the agreement reached between Plaintiff and Defendant Selene on December 16, 2009 is as follows:

1. The December 22, 2009, 1:00 pm telephonic deposition of Selene noticed by Plaintiff is being postponed for a date in the future.

2. Discovery between Selene and Judy Harper shall be globally extended and shall conclude on Monday, January 25, 2010. Selene and Ms. Harper shall be permitted to send each other document production requests, interrogatories, and

requests for admission within that time frame, in addition to conducting depositions of the other party as they see fit. All requests must be sent to the other party in sufficient time so that responses will be due on or before the close of business on Monday, January 25, 2010¹.

3. Ms. Harper's December 11, 2009 discovery requests to Selene shall stand, and Selene shall serve responses to them within the time frame required by law.

4. Ms. Harper will file her Initial Disclosures this week with the Court.

WHEREFORE, Plaintiff and Defendant Selene pray that the Court approve this agreement regarding discovery as set forth herein.

¹ This agreement is intended to stay within the timeframe limitations of Judge Hagy's November 24, 2009 order regarding discovery, and does not extend the overall closure of discovery, time for dispositive motions to be filed, etc., so that no delay will occur in the orderly and speedy resolution of this matter.

This 16 day of December, 2009.

MCCURDY AND CANDLER, L.L.C.

By: /s/Frank R. Olson²
Georgia Bar No. 553077
Attorneys for Plaintiff

P.O. Box 57
Decatur, GA 30031
(404) 373-1612
(404) 373-2471 (fax)

² Counsel for Selene represents to the Court that on the evening of December 16, 2009, he had a telephone conversation with Plaintiff Judy Harper and the agreement as set forth herein was reached between them. Counsel is filing this as a Joint Motion at the direction of Ms. Gage to reflect the agreement reached between the parties on this date and to obviate the need for the planned December 18 telephonic conference with the Court.

CERTIFICATION

The foregoing document was prepared using the Microsoft Word 2003 word processing program, in 12-point Courier New font, all in compliance with LR 5.1, NDGa, and was filed electronically via the Court's CM/ECF system which will automatically give notice of this filing to all CM/ECF participants, and the foregoing document was also served by regular United States mail to the following non-CM/ECF participants:

Judy Harper
2982 Duke of Windsor
East Point, GA 30344

And via email to: info@lovingitlive.com

Respectfully submitted this 16 day of December, 2009.

MCCURDY AND CANDLER, L.L.C.

By: /s/ Frank R. Olson
Georgia Bar No. 553077
Attorneys for Defendant Selene
Finance LP

P.O. Box 57
Decatur, Georgia 30031
Telephone: 404-373-1612